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IN THE UNITED STATES PATENT AND TRADEMARK OFFICE  
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Proceeding	91192093
Party	Plaintiff Pirelli Tyre S.p.A.
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Submission	Answer to Counterclaim
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Date	02/22/2010
Attachments	Pirelli's Answer to Counterclaim for Cancellation in ZERO MOTORCYCLES cancellation.pdf ( 4 pages )(11470 bytes )

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE  
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD**

PIRELLI TYRE S.P.A.  v.  ZERO MOTORCYCLES, INC.,   PIRELLI TYRE S.P.A. AND PIRELLI & C. S.P.A.,  v.  ZERO MOTORCYCLES, INC.,	Consolidated Opposition No. 91192093     Opposition No. 91192475 Cancellation No. 92051520 Cancellation No. 92051859
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**PETITIONERS' ANSWER TO COUNTERCLAIM FOR CANCELLATION OF U.S.  
REGISTRATION NO. 2749340**

Pirelli Tyre S.p.A., a società per azioni of Italy, having a place of business at Viale Sarca 222, I-20136 Milan, Italy, and Pirelli & C. S.p.A., a società per azioni of Italy, having a business address at Via Gaetano Negri 10, I-20123 Milan, Italy ("Petitioners"), by and through their attorneys, hereby answer the allegations set forth in Registrant's Counterclaim for Cancellation of Registration No. 2749340 as follows:

1. Petitioners deny the allegations set forth in Paragraph 1 of the Counterclaim.
2. Petitioners deny the allegations set forth in Paragraph 2 of the Counterclaim.
3. Petitioners deny the allegations set forth in Paragraph 3 of the Counterclaim.

4. Petitioners admit the allegations set forth in Paragraph 4 of the Counterclaim.

5. Petitioners admit the allegations set forth in Paragraph 5 of the Counterclaim.

6. Petitioners deny the allegations set forth in Paragraph 6 of the Counterclaim.

7. Petitioners deny the allegations set forth in Paragraph 7 of the Counterclaim.

8. Petitioners deny the allegations set forth in Paragraph 8 of the Counterclaim.

9. Petitioners deny the allegations set forth in Paragraph 9 of the Counterclaim.

10. Petitioners deny the allegations set forth in Paragraph 10 of the Counterclaim.

WHEREFORE, Petitioners respectfully request that this Counterclaim for Cancellation be dismissed, and that Registration No. 3669900 for the ZERO MOTORCYCLES mark be cancelled.

Respectfully submitted,

PIRELLI TYRE S.P.A. and  
PIRELLI & C. S.P.A.

Dated: February 22, 2010

By: /s/Virginia L. Carron  
Virginia L. Carron  
Laurence R. Hefter  
FINNEGAN, HENDERSON, FARABOW,  
GARRETT & DUNNER L.L.P.  
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Attorneys for Petitioners

**CERTIFICATE OF SERVICE**

I certify that a true and accurate copy of the foregoing PETITIONERS' ANSWER TO COUNTERCLAIM FOR CANCELLATION OF U.S. REGISTRATION NO. 2749340 was served, by agreement with counsel, via email on this 22<sup>nd</sup> day of February 2010, upon Registrant and counsel for Registrant at the following addresses:

Mike Rodenbaugh  
Rodenbaugh Law  
548 Market Street  
San Francisco, CA 94104  
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/s/Virginia L. Carron